

1 **PERKINS COIE LLP**

2 Abdul Kallon (*pro hac vice*)
3 AKallon@perkinscoie.com
4 Ryan Spear (*pro hac vice*)
5 RSpear@perkinscoie.com
6 1201 Third Avenue, Suite 4900
7 Seattle, WA 98101-3099
8 Telephone: 206.359.8000
9 Facsimile: 206.359.9000

10 Sunita Bali, Bar No. 274108
11 SBali@perkinscoie.com
12 Danielle Sivalingam, Bar No. 294369
13 DSivalingam@perkinscoie.com
14 Angie Kim, Bar No. 270503
15 AngieKim@perkinscoie.com
16 605 Howard Street, Suite 1000
17 San Francisco, CA 94105
18 Telephone: 415.344.7000
19 Facsimile: 415.344.7050

20 Michael R. Huston (*pro hac vice*)
21 MHuston@perkinscoie.com
22 700 13th St NW
23 Washington, DC 20005
24 Telephone: 202.654.6200
25 Facsimile: 202.654.621

26 *Attorneys for Defendant Google LLC*
27 (*erroneously sued as Google Inc.*)

28 **UNITED STATES DISTRICT COURT**
29
EASTERN DISTRICT OF CALIFORNIA

30 REPUBLICAN NATIONAL COMMITTEE,

31 Plaintiff,

32 v.

33 GOOGLE INC.,

34 Defendant.

35 Case No. 2:22-cv-01904-DJC-JDP

36 **STIPULATION AND [PROPOSED]**
37 **ORDER FOR A CONTINUANCE OF**
38 **HEARING AS TO DEFENDANTS' [30]**
39 **MOTION TO DISMISS AND**
40 **PLAINTIFF'S [34] MOTION TO STRIKE**

41 Dept: Courtroom 10, 13th Floor
42 Judge: Hon. Daniel J. Calabretta

1 Plaintiff Republican National Committee (“Plaintiff”) and Defendant Google LLC
2 (“Defendant”; erroneously sued as “Google Inc.”) (collectively, the “Parties”), by and through
3 their undersigned counsel, hereby stipulate as follows:

4 1. WHEREAS, on June 6, 2023, the Court issued a Minute Order setting a Motion
5 Hearing as to Defendant’s [30] Motion to Dismiss and Plaintiff’s [34] Motion to Strike for
6 June 22, 2023 [44];

7 2. WHEREAS, on June 12, 2023, Plaintiff filed an *ex parte* application for a
8 continuance of the hearing as to Defendant’s [30] Motion to Dismiss and Plaintiff’s [34] Motion
9 to Strike [45] and amended *ex parte* application for a continuance of the hearing as to
10 Defendant’s [30] Motion to Dismiss and Plaintiff’s [34] Motion to Strike [46], requesting a
11 continuance of the hearing because Plaintiff’s lead counsel will be out of the country from
12 June 14 to June 22, 2023;

13 3. WHEREAS, on June 13, 2023, Defendant responded to the *ex parte* applications
14 that it does not oppose a reasonable continuance of the hearing to accommodate Plaintiff’s
15 counsel [47];

16 4. WHEREAS, there have been no prior extensions by the parties as to the hearing on
17 these motions;

18 5. WHEREAS, the Parties have worked with the Court to determine that July 13,
19 2023 is a mutually-agreeable date for the Parties and the Court; and

20 6. WHEREAS, Plaintiff withdraws its pending *ex parte* applications [45, 46];

21 THEREFORE, the Parties respectfully request that the Court vacate the June 22, 2023
22 hearing date, set Defendant’s [30] Motion to Dismiss and Plaintiff’s [34] Motion to Strike for an
23 in-person hearing on July 13, 2023 at 1:30 p.m. in Courtroom 10 before District Judge Daniel J.
24 Calabretta, and allot one hour for the hearing to ensure that all issues in both motions can be
25 adequately addressed to the Court’s satisfaction.

26 **IT IS SO STIPULATED.**

1 Dated: June 18, 2023

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PERKINS COIE LLP

By: /s/ Sunita Bali

Sunita Bali, Bar No. 274108

Attorneys for Defendant Google LLC
(erroneously sued as Google Inc.)

Dated: June 18, 2023

DHILLON LAW GROUP INC.

By: /s/ Michael A. Columbo

Harmeet K. Dhillon, SBN 207873
Michael A. Columbo, SBN 271283
Jeremiah D. Graham, SBN 313206
Anthony J. Fusaro, Jr., SBN 345017

Counsel for Plaintiff Republican National
Committee

CONSOVOY MCCARTHY PLLC

Thomas R. McCarthy (*pro hac vice*)
Thomas S. Vaseliou (*pro hac vice*)
Conor D. Woodfin (*pro hac vice*)

Counsel for Plaintiff Republican National
Committee

ATTESTATION

Concurrence in the filing of this document has been obtained from the individual whose electronic signature is attributed above.

By: /s/ Sunita Bali

Sunita Bali, Bar No. 274108

Attorneys for Google LLC (erroneously sued as Google Inc.)

[PROPOSED] ORDER

2 The Court, having reviewed the Stipulation for a Continuance of Hearing as to
3 Defendant's [30] Motion to Dismiss and Plaintiff's [34] Motion to Strike, and good cause
4 appearing, HEREBY ORDERS that the June 22, 2023 hearing date is vacated, Defendant's [30]
5 Motion to Dismiss and Plaintiff's [34] Motion to Strike is set for an in-person hearing on July 13,
6 2023 at 1:30 p.m. in Courtroom 10 before District Judge Daniel J. Calabretta, and one hour is
7 allotted for the hearing.

IT IS SO ORDERED.

Dated: June __, 2023

Hon. Daniel J. Calabretta
United States District Judge